

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

IN RE:

CASE NO.: 24-52036-pwb

Courtney Trice,
aka Courtney Gilbert Trice,
aka Courtney G Trice,
Debtor.

CHAPTER 13

OBJECTION TO CONFIRMATION OF DEBTOR'S CHAPTER 13 PLAN

COMES NOW, U.S. Bank Trust National Association, as Trustee for Towd Point Master Funding Trust 2023-PM1 (hereinafter known as "Secured Creditor"), who holds a secured lien on the Debtor's real property known as 1052 Arbor Way, McDonough, GA 30253 and files this Objection to Confirmation of Debtor's Plan.

Secured Creditor anticipates filing a pre-petition arrears claim of approximately \$1,329.06. The Debtor is a Co-Borrower. However, the Chapter 13 Plan fails to include treatment of Secured Creditor's claim. Secured Creditor objects to the Plan and seeks clarification as to Debtor's intentions in regard to the subject property and claim. Accordingly, the Chapter 13 Plan fails to comply with the provisions of 11 U.S.C. § 1325(a).

WHEREFORE, Movant prays that this Court inquire into the matters raised herein and deny confirmation of the Chapter 13 Plan or enter such orders that the Court deems just and proper.

Robertson, Anschutz, Schneid & Crane LLC
Attorney for Secured Creditor
13010 Morris Rd., Suite 450
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Phone: (470) 321-7112
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By: /s/Willie Smith
Willie Smith
GA Bar Number 507412

Email: wismith@raslg.com

CERTIFICATE OF SERVICE

I hereby certify that on the **21st** day of **March, 2024**, I electronically filed the foregoing ***Objection to Confirmation*** using the Bankruptcy Court's Electronic Case Filing program, which sends a notice of this document and an accompanying link to this document to the following parties who have appeared in this case under the Bankruptcy Court's Electronic Case Filing program:

E. L. Clark
Clark & Washington, LLC
Bldg. 3
3300 Northeast Expwy.
Atlanta, GA 30341

K. Edward Safir
Standing Chapter 13 Trustee
Suite 1600
285 Peachtree Center Ave. NE
Atlanta, GA 30303

I further certify that on this day I caused a copy of this document to be served via ***UNITED STATES FIRST CLASS MAIL*** on the following parties at the address shown for each.

Courtney Trice
8635 Forrest Pointe Court
Jonesboro, GA 30238

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